

STATE OF ALASKA

SEAN PARNELL, Governor

ANILCA IMPLEMENTATION PROGRAM Office of Project Management and Permitting

550 W. 7TH AVENUE, SUITE 1430
ANCHORAGE, ALASKA 99501
PH: (907) 269-7529 / FAX: (907) 334-2509
susan.magee@alaska.gov

February 8, 2010

Greg Dudgeon, Superintendent
Gates of the Arctic National Park and Preserve
4175 Geist Road
Fairbanks, AK 99709

Dear Mr. Dudgeon:

The State of Alaska reviewed the Foundation Statement for the Gates of the Arctic National Park and Preserve. The following comments represent the consolidated views of the State's resource agencies.

We understand direction to prepare Foundation Statements comes from the National Park Service 2006 Management Policies and that information included in these documents will provide a basis for future planning efforts. As such, we anticipate certain information and statements will be duplicated in future planning documents. We are therefore requesting primarily technical clarifications we believe will prove beneficial in the long-term. We are available for follow-up questions or discussions if needed.

Page 4, Significance Statements

1. Other park managers in Alaska may not agree with the subjective statement that Gates is "*the premier*" Wilderness park in Alaska. For example, the Wrangell-St. Elias National Park and Preserve is larger overall, has more designated wilderness, and is part of a much larger World Heritage area. The claim would be more defensible by adding "arctic" in the description. This statement appears again on page 8 under Significance Statement.
3. Since the referenced mountain ecosystem expands beyond Gates borders, this statement would be more accurate if "*in its entirety*" were deleted.
5. We appreciate the phrase "*in consultation with local rural residents,*" however it is incomplete without reference to the State as well.

Page 8, Contiguous Wilderness. While we understand the intent of this statement, to avoid a comparison between Gates and the adjacent conservation system units, we recommend replacing "*the centerpiece*" with "*the park is centrally located within.*"

Page 9, Wild Rivers, Pristine Waters. We suggest adding "corridors" at the end of the sentence to reflect the fact that the park manages the uplands and the state manages the beds of navigable waterbodies and is primarily responsible for management of water quality.

Page 11, Wilderness Experience, Wilderness Dependent Species. This attribute does not seem to fit under “Wilderness Experience,” which presumably is about the human experience. We suggest moving this to “Wildlife” or “Wilderness.” We also recommend not describing wildlife as being “*wilderness dependent*.” Although the listed species are part of ecosystems that overlap areas designated as wilderness, these species are not dependent on a wilderness designation for survival, as may be suggested here. Lastly, the term “*keystone*” is unclear.

Page 12, Subsistence, Caribou Migration Range. This bullet incorrectly implies that the complete range of all three caribou herds are protected within the park. The language of page 10 under “Caribou Migration Corridors” is more clearly worded. Also, in light of the language on page 10, is another reference to caribou in this section necessary?

Page 12, Subsistence, Resident Zone Communities. The statement includes the following sentence: “*The park is also one of the few places in the national park system where one has the opportunity to establish residence and practice contemporary subsistence.*” While this is unique in the national context, it is not unique to Alaska parks. As worded, it also reads more like an advertisement than a statement about subsistence activities in the park. We recommend rephrasing or deleting this sentence.

Page 13, Subsistence, Primary Interpretative Theme. We recommend specifying that the park and preserve provide subsistence opportunities for “*Alaskan*” residents.

Page 13, Cultural Resources, Primary Interpretive Theme. We suggest the following underlined addition to avoid the implication that the entire homeland base lies within park boundaries: “*...as such it protects portions of the homelands of both the Koyukon Indian and the Nunamiut Eskimo peoples.*”

Page 14, Ambler Right-of-Way citation. We recommend referencing the full citation, Section 201(4)(b) through (e), and including a summary of all the subsections, not just the first. For example, the following is an excerpt from the 1986 GMP.

The remainder of this ANILCA section describes the process for an environmental and economic analysis to be prepared by the secretaries of the interior and transportation for determining the most desirable route and the terms and conditions for this right-of-way.

Page 27, Appendix B – Legislative History. The subtitle of this Appendix refers to background “*legislation.*” The 1978 Proclamation that follows is an administrative action, not legislation.

As stated in our comments on other park foundation statements, we recommend not including this Proclamation since it has been entirely superseded, as noted on page 27.

Thank you for this opportunity to comment. Please contact me at (907) 269-7529 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "S. Magee". The signature is fluid and cursive, with the first letter of the last name being a large, prominent capital 'M'.

Susan E. Magee
ANILCA Project Coordinator

cc: Sally Gibert, ANILCA Program Coordinator
Joan Darnell, NPS Alaska Region